

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: CarePoint Health Systems Inc. d/b/a Just Health Foundation, et al., ¹ <div style="text-align: center; padding-top: 20px;">Debtors.</div>	x : : : : : : : v	Chapter 11 Case No. 24-12534 (JKS) (Jointly Administered)
---	---	---

**NOTICE OF AGENDA REGARDING MATTERS SCHEDULED FOR HEARING ON
DECEMBER 10, 2024 AT 10:30 A.M. (ET)²**

This proceeding will be conducted **in-person**.

All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom.
Please refer to Judge Stickles' Chambers Procedures
(<https://www.deb.uscourts.gov/content/judge-j-kate-stickles>) and the Court's website
(<http://www.deb.uscourts.gov/ecourt-appearances>) for information on who may participate
remotely, the method of allowed participation (video or audio), Judge Stickles' expectations of
remote participants, and the advance registration requirements.

Registration is required by 4:00 p.m. (Prevailing Eastern Time) the business day before the
hearing unless otherwise noticed using the [eCourtAppearances](http://www.deb.uscourts.gov/ecourt-appearances) tool available on the Court's
website.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: (i) Bayonne Intermediate Holdco, LLC (7716); (ii) Benego CarePoint, LLC (2199); (iii) Briar Hill CarePoint, LLC (iv) CarePoint Health Management Associates Intermediate Holdco, LLC (none); (v) CarePoint Health Management Associates, LLC d/b/a CarePoint Health (3478); (vi) CarePoint Health Systems, Inc. d/b/a Just Health Foundation (6996); (vii) CH Hudson Holdco, LLC (3376); (viii) Christ Intermediate Holdco, LLC (3376); (ix) Evergreen Community Assets (1726); (x) Garden State Healthcare Associates, LLC (4414); (xi) Hoboken Intermediate Holdco, LLC (2105); (xii) Hudson Hospital Holdco, LLC (3869); (xiii) Hudson Hospital Opco, LLC d/b/a CarePoint Health-Christ Hospital (0608); (xiv) HUMC Holdco, LLC (3488); (xv) HUMCO Opco, LLC d/b/a CarePoint Health-Hoboken University Medical Center (7328); (xvi) IJKG, LLC (7430); (xvii) Just Health MSO, LLC (1593); (xviii) New Jersey Medical and Health Associates d/b/a CarePoint Health Medical Group (0232); (xix) Quality Care Associates, LLC (4710); (xx) Sequoia BMC Holdco, LLC (9812); (xxi) IJKG Opco LLC d/b/a CarePoint Health-Bayonne Medical Center (2063). The address for CarePoint Health Systems Inc. is 308 Willow Avenue, Hoboken, NJ 07030.

² All motions and other pleadings referenced herein are available online at the following web address:
<https://dm.epiq11.com/CarePoint>

I. MATTERS UNDER CNO:

1. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to File a Consolidated List of the Debtors' Thirty Largest Unsecured Creditors and (II) Establishing Patient Notice Procedures [Filed 11/03/2024; D.I. [5](#)].

Related Documents:

- A. Interim Order (I) Authorizing the Debtors to File a Consolidated List of the Debtors' Thirty Largest Unsecured Creditors and (II) Establishing Patient Notice Procedures [Filed: 11/07/2024; D.I. [103](#)].
- B. Certificate of No Objection Regarding Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to File a Consolidated List of the Debtors' Thirty Largest Unsecured Creditors and (II) Establishing Patient Notice Procedures [Filed: 12/05/2024; D.I. [227](#)].

Objection Deadline: December 3, 2024 at 4:00 p.m. (ET)

Objections Received: None.

Status: A CNO has been filed. No hearing is necessary unless required by the Court.

2. Application of the Debtors for Authority to Retain and Employ Epiq Corporate Restructuring, LLC as Administrative Advisor [Filed: 11/18/2024; D.I. [144](#)].

Related Documents:

- A. Certificate of No Objection Regarding Application of the Debtors for Authority to Retain and Employ Epiq Corporate Restructuring, LLC as Administrative Advisor [Filed: 12/05/2024; D.I. [228](#)].

Objection Deadline: December 2, 2024 at 4:00 p.m. (ET)

Objections Received: None.

Status: A CNO has been filed. No hearing is necessary unless required by the Court.

3. Motion of Debtors for Entry of an Order Extending the Time Within Which Debtors Must File Their Schedules of Assets and Liabilities and Statements of Financial Affairs [Filed: 11/05/2024; D.I. [58](#)].

Related Documents:

- A. Certification of No Objection Regarding Motion of Debtors for Entry of an Order Extending the Time Within Which Debtors Must File Their Schedules of Assets and Liabilities and Statements of Financial Affairs [Filed: 12/05/2024; D.I. [229](#)].

Objection Deadline: December 3, 2024 at 4:00 p.m.

Status: A CNO has been filed. No hearing is necessary unless required by the Court.

II. MATTERS UNDER COC:

4. Motion of Debtors for Interim and Final Order Approving Certain Procedures to Maintain the Confidentiality of Patient Information as Required by Applicable Privacy Rules [Filed 11/03/2024; D.I. [6](#)].

Related Documents:

- A. Interim Order Approving Certain Procedures to Maintain the Confidentiality of Patient Information as Required by Applicable Privacy Rules [Filed: 11/07/2024; D.I. [102](#)].
- B. Certification of Counsel Regarding Order Approving Certain Procedures to Maintain the Confidentiality of Patient Information as Required by Applicable Privacy Rules [Filed: 12/05/2024; D.I. [236](#)].

Objection Deadline: December 3, 2024 at 4:00 p.m. (ET)

Objections Received: Informal comments were received from the U.S. Trustee and the Creditor Committee.

Status: A COC has been submitted. No hearing is necessary unless required by the Court.

5. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Continued Use of the Debtor's Cash Management System and Existing Bank Accounts, (II) Authorizing Continued Intercompany Transfers Among Debtors Entities and (III) Granting Related Relief [Filed 11/03/2024, D.I. [7](#)].

Related Documents:

- A. Interim Order (I) Authorizing the Continued Use of the Debtor's Cash Management System and Existing Bank Accounts, (II) Authorizing Continued Intercompany Transfers Among Debtors Entities and (III) Granting Related Relief [Filed: 11/06/2024; D.I. [83](#)].
- B. Certification of Counsel Regarding Final Order (I) Authorizing the Continued Use of the Debtor's Cash Management System and Existing Bank Accounts, (II) Authorizing Continued Intercompany Transfers Among Debtors Entities and (III) Granting Related Relief [Filed: 12/05/2024; D.I. [230](#)].

Objection Deadline: December 3, 2024 at 4:00 p.m. (ET)

Objections Received:

- C. Objection of Strategic Ventures, LLC to Garden State Healthcare Associates, LLC's Use of Cash Collateral [Filed: 11/13/2024; D.I. [133](#)].

Status: A COC has been submitted. No hearing is necessary unless required by the Court.

6. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service and (IV) Granting Related Relief [Filed 11/03/2024, D.I. [8](#)].

Related Documents:

- A. Certification of Counsel Regarding Interim Order Authorizing Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief [Filed: 11/08/2024; D.I. [123](#)]
- B. Interim Order (I) Authorizing the Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility

Companies from Altering, Refusing, or Discontinuing Service and (IV) Granting Related Relief [Filed: 11/08/2024; D.I. [125](#)].

- C. Certification of Counsel Regarding Final Order (I) Authorizing the Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service and (IV) Granting Related Relief [Filed: 12/05/2024; D.I. [231](#)].

Objection Deadline: December 3, 2024 at 4:00 p.m. (ET)

Objections Received:

- D. Objection of Public Service Electric and Gas Company to Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief [Filed: 11/22/2024; D.I. [183](#)].
- E. Notice of Withdrawal of Objection of Public Service Electric and Gas Company to Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief [Filed: 12/05/2024; D.I. 224].

Status: A COC has been submitted. No hearing is necessary unless required by the Court.

7. Motion for Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Taxes and (II) Granting Related Relief [Filed 11/03/2024, D.I. [9](#)].

Related Documents:

- A. Certification of Counsel Regarding Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Taxes and (II) Granting Related Relief [Filed: 12/05/2024; D.I. [232](#)].

Objection Deadline: December 3, 2024 at 4:00 p.m. (ET)

Objections Received: None.

Status: A COC has been submitted. No hearing is necessary unless required by the Court.

8. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing, But Not Directing, the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs; and (II) Granting Related Relief [Filed 11/04/2024, D.I. [12](#)].

Related Documents:

- A. Interim Order (I) Authorizing, But Not Directing, the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs; and (II) Granting Related Relief [Filed: 11/06/2024; D.I. [82](#)].
- B. Certification of Counsel Regarding Final Order (I) Authorizing, But Not Directing, the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs; and (II) Granting Related Relief [Filed: 12/05/2024; D.I. [233](#)].

Objection Deadline: December 3, 2024 at 4:00 p.m. (ET). The objection deadline has been extended to December 5, 2024 at 4:00 p.m. for the Official Creditors Committee only.

Objections Received: Informal comments were received from the Creditor's Committee.

Status: A COC has been submitted. No hearing is necessary unless required by the Court.

9. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Continue Their Insurance Policies Entered into Prepetition and Pay Prepetition Obligations in Respect Thereof, (B) Honor Prepetition Premium Financing Agreement, and (C) Renew Insurance Premium Financing Agreement in the Ordinary Course of Business; (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereof; and (III) Granting Related Relief [Filed 11/04/2024, D.I. [13](#)].

Related Documents:

- A. Interim Order (I) Authorizing the Debtors to Continue Their Insurance Policies Entered into Prepetition and Pay Prepetition Obligations in Respect Thereof, (B) Honor Prepetition Premium Financing Agreement, and (C) Renew Insurance Premium Financing Agreement in the Ordinary Course of Business; (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereof; and (III) Granting Related Relief [Filed: 11/06/2024; D.I. [84](#)].
- B. Certification of Counsel Regarding Final Order (I) Authorizing the Debtors to Continue Their Insurance Policies Entered into Prepetition and Pay Prepetition Obligations in Respect Thereof, (B) Honor Prepetition Premium Financing Agreement, and (C) Renew Insurance Premium Financing Agreement in the Ordinary Course of Business; (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereof; and (III) Granting Related Relief [Filed: 12/05/2024; D.I. [234](#)].

Objection Deadline: December 3, 2024 at 4:00 p.m. (ET)

Objections Received: Informal comments were received from the Creditor's Committee.

Status: A COC has been submitted. No hearing is necessary unless required by the Court.

- 10.** Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Patient Care Vendors and (II) Granting Related Relief [Filed 11/04/2024, D.I. [14](#)].

Related Documents:

- A. Certification of Counsel Regarding Interim Order (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Patient Care Vendors and (II) Granting Related Relief [Filed: 11/08/2024; D.I. [124](#)]
- B. Interim Order (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Patient Care Vendors and (II) Granting Related Relief [Filed: 11/08/2024; D.I. [126](#)].
- C. Certification of Counsel Regarding Final Order (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Patient Care Vendors and (II) Granting Related Relief [Filed: 12/05/2024; D.I. [237](#)].

Objection Deadline: December 3, 2024 at 4:00 p.m. (ET). The objection deadline has been extended to December 5, 2024 at 4:00 p.m. for the Official Creditors Committee only.

Objections Received: Informal comments were received from the Creditor's Committee.

Status: A COC has been submitted. No hearing is necessary unless required by the Court.

11. Motion of the Debtors for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals; and (II) Granting Related Relief [Filed: 11/19/2024; D.I. [161](#)].

Related Documents:

- A. Certification of Counsel Regarding Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals [Filed: 12/05/2024; D.I. [238](#)].

Objection Deadline: December 3, 2024 at 4:00 p.m. (ET)

Objections Received: Informal comments were received from the U.S. Trustee.

Status: A COC has been submitted. No hearing is necessary unless required by the Court.

III. MATTERS GOING FORWARD

12. Application of the Debtors for Entry of an Order (I) Authorizing the Debtors to Retain and Employ Dilworth Paxson LLP as Counsel, Effective as of the Petition Date and (II) Granting Related Relief [Filed: 11/04/2024; D.I. [36](#)].

Related Documents:

- A. Supplemental Declaration of Peter C. Hughes Regarding Application for Retention of Dilworth Paxson LLP as Counsel to the Debtors [Filed: 11/19/2024; D.I. [151](#)].

Objection Deadline: December 3, 2024 at 4:00 p.m. (ET). The objection deadline has been extended to December 6, 2024 at 10:00 a.m. for the U.S. Trustee only.

Objections Received: Informal comments were received from the U.S. Trustee.

Status: As of the filing of this agenda, the comments of the U.S. Trustee have not been resolved. This matter is going forward.

- 13.** Application of the Debtors for Entry of an Order (I) Authorizing the Debtors to Retain Ankura Consulting Group, LLC as Financial Advisor to the Debtors and (II) Granting Related Relief [Filed: 11/13/2024; D.I. [132](#)].

Related Documents: None.

Objection Deadline: November 27, 2024 at 4:00 p.m. (ET). The objection deadline has been extended to December 5, 2024 at 4:00 p.m. for the U.S. Trustee and Official Creditors Committee only.

Objections Received: Informal comments were received from the U.S. Trustee and Official Creditors Committee.

Status: This matter is going forward.

- 14.** Motion of the Debtors for the Entry of an Order (I) Authorizing the Debtors to Retain, Employ and Compensate Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief [Filed: 11/19/2024; D.I. [160](#)].

Related Documents:

A. Amended Schedule I – Non-Exclusive List of Ordinary Course Professionals [Filed: 12/05/2024; D.I. [225](#)].

B. Revised Form of Declaration [Filed: 12/05/2024; D.I. [239](#)]

Objection Deadline: December 3, 2024 at 4:00 p.m. (ET). The objection deadline has been extended to December 5, 2024 at 4:00 p.m. for the U.S. Trustee and Official Creditors Committee only.

Objections Received:

C. Objection of U.S. Trustee to Debtor's Motion for Entry of an Order (I) Authorizing the Debtors to Retain, Employ and Compensate Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief [Filed: 12/04/2024; D.I. [220](#)].

Status: This matter is going forward.

- 15.** Motion of CarePoint Health Systems, Inc. for Entry of Interim and Final Orders: (I) Authorizing Debtors to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender

Pursuant to Section 364 of the Bankruptcy Code; (III) Granting Adequate Protection; (IV) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (V) Authorizing Debtors to Use Cash Collateral [Filed 11/03/2024; D.I. [10](#)].

Related Documents:

- A. Certification of Counsel Regarding Interim Order Authorizing Debtors to Postpetition Financing [Filed: 11/07/2024; D.I. [86](#)].
- B. Interim Order Authorizing Debtors to Postpetition Financing [Filed: 11/07/2024; D.I. [87](#)].
- C. Certification of Counsel Regarding Interim Order (I) Authorizing Certain Debtors to Obtain Postpetition Financing from Bayonne Medical Center Opco, LLC and Granting Senior Security Interests and Superpriority Administrative Expense Status to the Lender; (II) Authorizing the Debtors' Use of Cash Collateral; (III) Granting Adequate Protection; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief [Filed: 11/08/2024; D.I. [118](#)].
- D. Interim Order (I) Authorizing Certain Debtors to Obtain Postpetition Financing from Bayonne Medical Center Opco, LLC and Granting Senior Security Interests and Superpriority Administrative Expense Status to the Lender; (II) Authorizing the Debtors' Use of Cash Collateral; (III) Granting Adequate Protection; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief [Filed: 11/08/2024; D.I. [119](#)].
- E. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)].

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET)

Responses:

- F. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024; D.I. [71](#)].
- G. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)].
- H. Objection of Strategic Ventures, LLC to Garden State Healthcare Associates, LLC's Use of Cash Collateral [Filed: 11/13/2024; D.I. [133](#)].

Status: This matter has generally been continued to December 16, 2024 at 9:30 a.m. provided that a further interim financing order covering the period to December 16, 2024 is required. The Debtors, the Committee, and HRH are in the process of

negotiating a stipulation which is expected to incorporate certain terms of the previous DIP Financing Orders and address the terms of interim financing through January 7, 2025. In the event the parties have not agreed on the terms of such stipulation or the terms of a further interim financing order, the Debtors intend to go forward at the hearing with respect to the terms of such interim financing order.

- 16.** Motion of IJKG Opco, LLC and IJKG, LLC for Entry of Interim and Final Orders: (I) Authorizing IJKG Opco, LLC and IJKG, LLC to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed 11/03/2024, D.I. [11](#)].

Related Documents:

- A. Amendment to Motion of IJKG Opco, LLC and IJKG, LLC for Entry of Interim and Final Orders: (I) Authorizing IJKG Opco, LLC and IJKG, LLC to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed: 11/06/2024, D.I. [68](#)].
- B. Certification of Counsel Regarding Interim Order Authorizing Debtors to Postpetition Financing [Filed 11/07/2024, D.I. [86](#)]. (See 15A)
- C. Interim Order Authorizing Debtors to Postpetition Financing [Filed: 11/07/2024, D.I. [87](#)]. (See 15B)
- D. Certification of Counsel Regarding Interim Order (A) Authorizing IJKG Opco, LLC and IJKG, LLC to Obtain Postpetition Financing, (B) Authorizing Debtors to Use Cash Collateral, (C) Granting Liens and Providing Superpriority Administrative Expense Status, (D) Modifying the Automatic Stay, (E) Authorizing Debtors to Enter Into Agreements with Bayonne Medical Center Opco, LLC, (F) Granting Adequate Protection, (G) Scheduling a Final Hearing and (H) Granting Related Relief [Filed: 11/08/2024; D.I. [127](#)].
- E. Interim Order (A) Authorizing IJKG Opco, LLC and IJKG, LLC to Obtain Postpetition Financing, (B) Authorizing Debtors to Use Cash Collateral, (C) Granting Liens and Providing Superpriority Administrative Expense Status, (D) Modifying the Automatic Stay, (E) Authorizing Debtors to Enter Into Agreements with Bayonne Medical Center Opco, LLC, (F) Granting

Adequate Protection, (G) Scheduling a Final Hearing and (H) Granting Related Relief [Filed: 11/08/2024; D.I. [128](#)].

- F. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)]. (See 15E)

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET)

Responses:

- G. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024, D.I. [71](#)]. (See 15F)
- H. BMC Hospital, LLC's Objection to (I) Bayonne Debtors' DIP Financing Motion (II) Collateral Surrender Motion, and (III) Management Services Motion [Filed: 11/06/2024; D.I. [76](#)].
- I. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)] (See 15G).
- J. Objection of Strategic Ventures, LLC to Garden State Healthcare Associates, LLC's Use of Cash Collateral [Filed: 11/13/2024; D.I. [133](#)]. (See 15H)

Status: This matter has been generally been continued to December 16, 2024 at 9:30 a.m. provided that a further interim financing order covering the period to December 16, 2024 is required. The Debtors, the Committee, and HRH are in the process of negotiating a stipulation which is expected to incorporate certain terms of the previous DIP Financing Orders and address the terms of interim financing through January 7, 2025. In the event the parties have not agreed on the terms of such stipulation or the terms of a further interim financing order, the Debtors intend to go forward at the hearing with respect to the terms of such interim financing order.

Status:

17. Motion of Debtors IJKG Opco, LLC and IKJG, LLC for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow *Inter Alia*, Interim Hospital Operations, (B) A Final Order Approving A Private Sale of All Or Substantially All Assets of IJKG Opco, LLC and IJKG, LLC and (C) Granting Related Relief [Filed: 11/04/2024, D.I. [18](#)].

Related Documents:

- A. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)]. (See 15E)

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET) and is now extended to December 20, 2024 at 4:00 p.m.

Responses:

- B. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024, D.I. [71](#)]. (See 15F).
- C. BMC Hospital, LLC's Objection to (I) Bayonne Debtors' DIP Financing Motion (II) Collateral Surrender Motion, and (III) Management Services Motion [Filed: 11/06/2024; D.I. [76](#)]. (See 15H).
- D. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)] (See 15G).

Status: Consideration of the merits of this matter has been continued to January 7, 2025. The parties may submit an interim stipulation with respect to the subject matter of this matter in advance of January 7, 2025.

- 18.** Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Assumption of Management Services Agreement, (II) Scheduling a Final Hearing, and (III) Granting Related Relief [Filed: 11/04/2024, D.I. [19](#)].

Related Documents:

- A. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)]. (See 15E)

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET) and is now extended to December 20, 2024 at 4:00 p.m.

Responses:

- B. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024, D.I. [71](#)]. (See 15F).
- C. BMC Hospital, LLC's Objection to (I) Bayonne Debtors' DIP Financing Motion (II) Collateral Surrender Motion, and (III) Management Services Motion [Filed: 11/06/2024; D.I. [76](#)]. (See 16H).
- D. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)] (See 15G).

Status: Consideration of the merits of this matter has been continued to January 7, 2025. The parties may submit an interim stipulation with respect to the subject matter of this matter in advance of January 7, 2025.

IV. MATTERS GOING FORWARD

19. Status Conference regarding matters for hearing on January 7, 2025.

Related Documents: None.

Objection Deadline: None.

Objections Received: None.

Status: This matter is going forward.

Dated: December 5, 2024

DILWORTH PAXSON LLP

/s/ Peter C. Hughes

Peter C. Hughes (DE 4180)
800 N. King Street, Suite 202
Wilmington, DE 19801
Telephone: 302-571-9800
Facsimile: 302-571-8875
Email: phughes@dilworthlaw.com

and

Lawrence G. McMichael (admitted *pro hac vice*)
Peter C. Hughes (DE 4180)
Anne M. Aaronson (admitted *pro hac vice*)
Jack Small (admitted *pro hac vice*)
1500 Market St., Suite 3500E
Philadelphia, PA 19102
Telephone: (215) 575-7000
Facsimile: (215) 754-4603
Email: lmcmichael@dilworthlaw.com
Email: phughes@dilworthlaw.com
Email: aaaronson@dilworthlaw.com
Email: jsmall@dilworthlaw.com

Proposed Counsel for the Debtors